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July 10, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Ex Parte Submission:**

**In the Matter of Cellular Service and Other Commercial
Mobile Radio Services in the Gulf of Mexico,
WT Docket No. 97-112**

**Amendment of Part 22 of the Commission's Rules to Provide
For Filing and Processing of Applications for Unserved Areas
in the Cellular Service and to Modify Other Cellular Rules,
CC Docket No. 90-6**

Dear Ms. Salas:

Pursuant to Section 1.1206(b) of the Commission's Rules, Centennial Communications Corp. ("Centennial")¹ submits four copies of this letter for inclusion in the public record of the above-referenced proceeding. As explained below, Centennial supports the proposal of Alltel Corporation ("Alltel") as an equitable and effective compromise measure to resolve the issues relating to the licensing of cellular service in the Gulf of Mexico.

Through its affiliates, Centennial provides cellular service to one MSA and two RSAs serving approximately 200 miles of territory along the Gulf coast in Texas and Louisiana.² In

¹ Centennial recently changed its name from Centennial Cellular Corp.

² Bauce Communications of Beaumont, Inc. is the A block licensee for the Beaumont-Port Arthur, TX MSA. Centennial Southeast License Company LLC is the A block licensee for the LA 5 and 6 RSAs.

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response to the Public Notice seeking comments on the Commission's proposal to establish a 12-mile "Coastal Zone" and to auction new licenses in this area,³ Centennial filed reply comments on May 30, 2000. In its comments, Centennial identified a number of problems with the Commission's proposal as well as the proposals of certain other Gulf carriers and offered its own proposal for establishment of a five-mile buffer zone between the Gulf shoreline and points five miles into the Gulf. Under Centennial's proposal, land-based carriers could place service area boundary ("SAB") contours no more than five miles from the shore, Gulf-based carriers could place contours no further in than the shoreline, and no new licenses would be awarded in this area.

Alltel filed comments proposing the creation of a similar buffer zone in the Gulf.⁴ Under Alltel's proposal, the buffer zone in which both land-based and water-based carriers could operate would extend 12 miles from the shoreline. The CGSA of land-based carriers (in which these carriers would have interference protection) would remain at the coastline, while the CGSA for Gulf-based carriers would begin at the border of the buffer zone (i.e., 12 nautical miles from the shoreline). Gulf-based carriers could initiate, discontinue or reinstate service to particular platforms at any time in the Gulf, subject only to frequency coordination obligations in the buffer zone. As under Centennial's proposal, there would be no auction of new markets in the Gulf.

The reply comments in this proceeding indicate that Alltel's proposal enjoys wide support among other land-based carriers. (A number of carriers jointly filed reply comments with Alltel, and a number of other carriers filed separate reply comments indicating their support for the Alltel proposal.) Centennial notes that Alltel's proposal is consistent with its own proposal and that both would resolve the central problem facing land-based carriers in the Gulf. As Centennial explained in its reply comments, current rules prohibit land-based carriers from extending their SAB beyond the shoreline. As a result, they cannot generate enough signal strength to reliably serve beachfront businesses such as hotels and office buildings, particularly because of the proliferation of hand-held devices used inside these buildings. The Centennial and Alltel proposals would solve this problem by allowing land-based carriers to place cell sites closer to the shoreline (because the SAB can extend into the buffer zone).

Centennial is submitting this letter to inform the Commission that it supports the Alltel proposal. Commission rules based upon Alltel's proposal would meet consumer expectations of reliable service at the beachfront and, accordingly, would serve the public interest. Moreover, because Alltel's proposal enjoys widespread support, adoption of that proposal appears to be the best way to bring this long-delayed proceeding to a successful conclusion.

³ See Public Notice, Federal Register Publication of the Second Further Notice of Proposed Rule Making Regarding the Licensing of Cellular Service and Other Commercial Mobile Radio Services in the Gulf of Mexico, DA 00-687 (Mar. 27, 2000).

⁴ See Further Comments of Alltel Corporation (dated May 15, 2000).

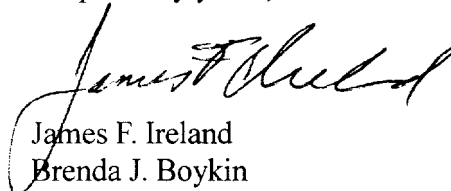
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Please contact the undersigned if you have any questions about this matter.

Respectfully yours,

A handwritten signature in black ink, appearing to read "James F. Ireland". The signature is fluid and cursive, with a large initial "J" and "I".

James F. Ireland
Brenda J. Boykin

cc: Davida Grant, Wireless Telecommunications Bureau